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Public Service Commission of Wisconsin
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June 30, 2021

Ms. Jolene Sheil
Public Service Commission of Wisconsin
Division of Energy Regulation
4822 Madison Yard Way
Madison, WI 53707-7854

Re: We Energies Voluntary Programs. Docket No. 5-EE-2022

Dear Ms. Sheil:

Enclosed is the We Energies 2022-2023 Energy Efficiency Voluntary Program Plan.

If you have any questions concerning this report, please contact Missie Muth at 414-221-2380 or missie.muth@wecenergygroup.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Theodore T. Eidukas".

Theodore T. Eidukas
Vice President - Regulatory Affairs

Enclosure



Voluntary Program Plan

**Customer Service
We Energies**

**2022-2023
Energy Efficiency Voluntary Program**

June 30, 2021

For Docket 5-EE-2022

Residential Assistance Program Summary and Description

The Residential Assistance Program (RAP) provides home weatherization assistance to selected eligible We Energies customers to help reduce energy costs. Customers selected include residential homeowners who participate in We Energies income qualified programs. In addition, RAP supports referrals from the State Low Income Weatherization Program, community partners, and other internal and external sources related to emergency situations.

The program is designed to address the energy efficiency of the entire home (e.g., heating system, building envelope, low cost energy efficiency measures).

RAP is not a new program, yet We Energies continues to enhance and improve the process and benefits. We Energies intends to continue to offer the existing program in 2022-2023 with no changes. In addition, we will explore pilot opportunities for the potential expansion of the RAP program. We recognize that many income qualified customers rent properties rather than own properties. We Energies will pilot additional customer types and may consider adjustments to income eligibility criteria in an effort to identify additional program participants. These pilot opportunities are intended to help us look at challenges for pilot groups in an effort to remove barriers and increase eligible participants for program participation and possible program expansion.

The RAP team coordinates closely with Focus on Energy in delivering the Residential Assistance Program and leverages Focus on Energy resources and incentives to ensure maximum benefit to customers.

Annual Gas Voluntary Program Budget	
WEGO Voluntary Programs	\$ 404,133
WG Voluntary Programs	\$ 520,867
Total	\$ 925,000

Residential Assistance Program Plan	
Program Description	<p>The We Energies Residential Assistance Program (RAP) is available to selected natural gas customers who are homeowners and are below 80% of the state median income (SMI). While other referrals are accepted, customers are identified primarily through their participation in the We Energies income qualified programs. During 2022-2023, We Energies will consider flexible eligibility criteria for participation in the RAP program.</p> <p>The We Energies income qualified programs were designed to assist customers who are recovering from being delinquent on their utility bills.</p>

Residential Assistance Program Plan	
	We Energies will continue to coordinate with Focus on Energy to supplement their incentive offerings through the Home Performance with ENERGY STAR Program and other related Focus on Energy program offerings. This also ensures that Residential Assistance Program projects are reviewed according to Focus on Energy quality control standards.
Target Market	RAP is primarily available to natural gas customers who are homeowners of one to three unit structures and participate in the We Energies income qualified programs. In addition, RAP supports referrals from the State Low Income Weatherization Program, community partners, and other internal and external sources related to emergency situations.
Pilot Markets	<p>Pilot markets may include:</p> <ol style="list-style-type: none"> 1. Owner occupied 4 or greater unit structures 2. Non owner occupied 1-5 unit structures 3. Multi-family (6-12 units) 4. Non-profit organizations 5. Other (to be determined in collaboration with the PSCW staff) <p>*Note – Pilot markets 1 -3 will have an income qualification component.</p>
Eligible Measures	<p>Qualified weatherization measures will include Focus on Energy incentives and other measures that can assist the home owner to reduce their energy use. All measures are directly installed by selected trade allies.</p> <p>Measures that qualify for Focus on Energy incentives:</p> <ul style="list-style-type: none"> • Attic and wall insulation • Air sealing • High efficiency furnace and boiler replacement • Smart thermostats • Water heaters <p>Additional measures that We Energies will include, with customer approval :</p> <ul style="list-style-type: none"> • Carbon Monoxide detectors • LED lightbulbs <p>Additional measures that We Energies may include:</p> <ul style="list-style-type: none"> • Sill box insulation

Residential Assistance Program Plan	
	<ul style="list-style-type: none"> • Air infiltration not included under Focus incentive (e.g., hole in external door or home structure, broken glass on external window) • Furnace and boiler tune-ups and repairs • Natural gas appliance repair or replacement • Dryer venting • Remove and replace Mercury thermostats • Other measures as identified on a case by case basis in consultation with PSCW staff.
Delivery Strategy	<ul style="list-style-type: none"> • We Energies will identify and verify RAP eligibility including income and home ownership verification. • Residential Assistance Program project work is performed by a selection of Focus on Energy qualified Home Performance with Energy STAR Trade Allies within We Energies service territory. All Trade Ally activity will be in compliance with Focus on Energy Program Standards. Trade allies are monitored to ensure high quality work and customer service. • The Focus on Energy Trade Allies will: <ul style="list-style-type: none"> ➤ Perform the home assessment. (Trade Ally personnel who perform home assessments are required to be BPI certified.) ➤ Submit a proposal of work to the Program Manager for approval. ➤ Complete measures as specified in the approved proposal. ➤ Perform a final inspection for each project. ➤ Submit all Focus on Energy required documentation for incentives. ➤ Submit an invoice to We Energies for the remaining balance. • Consistent with their procedures, Focus on Energy will conduct follow-up inspections on a sampling of completed jobs. • Pilot market delivery strategy will follow the same strategy as the existing RAP program and is similarly expected to rely on Focus on Energy trade allies and Focus on Energy policies and procedures.
Marketing and Communications	<p>There may be limited advertising of RAP which reduces the potential for customer confusion with other weatherization programs (e.g., Focus on Energy and the State Low Income Weatherization Program).</p>

Residential Assistance Program Plan	
	<p>This program may have limited through advertisements or public relations media outlets. Customer outreach is provided to customers through a selection letter and follow up by the assigned Trade Ally.</p>
Incentive Strategy	<p>The Residential Assistance Program will supplement and pay to the Trade Ally contractor the remaining invoiced balance for all measures qualifying for the Focus on Energy Home Performance with ENERGY STAR Program and other Focus on Energy and energy efficiency program offerings relating to the goals of the Residential Assistance Program.</p> <p>Weatherization efforts will reduce energy costs for program participants, inform customers about their energy use, and put them in a better position to participate in other relevant Focus on Energy programs.</p>
EM&V Strategy	<p>The Residential Assistance Program has undergone no major changes since the last ordered process evaluation. We Energies will allocate additional customer service conservation escrow budget as needed to comply with any future ordered evaluation activities.</p>
Budget	<p>There will be an annual budget of \$925,000. The Focus on Energy incentives and utilization of Trade Allies continue to reduce the cost to the program.</p>
Pilot Budget	<p>Budget for the pilot markets will use either existing RAP allocated dollars (listed above) or unspent conservation escrow dollars for that year.</p>
Program Goals and Targets	<p>Goals:</p> <ul style="list-style-type: none"> • 150 units completed annually • Adhere to program budget <p>Target:</p> <ul style="list-style-type: none"> • Though Home Performance Program savings are claimed by Focus on Energy, we anticipate that customers served by the Residential Assistance Program will save 35,700 therms, as reported by Focus on Energy. For electric savings related to LED bulb installation, savings will be estimated from Focus on Energy Technical Reference Manual, and reported in the We Energies annual conservation escrow report to PSCW. • Customer Satisfaction: Customer satisfaction with our brand and the service provided will be measured via a survey. This will assist in

Residential Assistance Program Plan	
	assessing the customer experience and making any necessary program adjustments.
Pilot goals and targets	During the pilot phase, our goal will be to learn the best potential candidates for a RAP program expansion. We will report our pilot results in our PSCW Annual Conservation Activities report each year. Unit goals may be defined at a later date if pilots are deemed feasible for future program roll-outs.
Coordination with Focus on Energy and other stakeholders	Coordination with State Weatherization efforts and with the Focus on Energy Home Performance with Energy Star and Enhanced Rewards Programs is critical to program success. Regular communication with all parties will occur to provide updates and address any issues. We Energies will continue to coordinate closely with Focus on Energy and the State of Wisconsin weatherization efforts, including sharing information of customer participation. This ensures that Residential Assistance Program projects are reviewed according to Focus on Energy quality control standards.